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May 29, 2020

Honorable Alison J. Nathan, U.S.D.J.
Southern District of New York
United States Courthouse, Courtroom 906
40 Foley Square
New York, New York 10007

Re: United States v. Pilgrim
Docket No. 0208 1: S2 15CR95-030(AJN)

Dear Judge Nathan:

Pursuant to the Court's Order I have been appointed to determine if Mr. Pilgrim can present a meritorious post conviction application.

Recently I had a productive discussion with AUSA Allison Nichols. I am reasonably confident a resolution can be achieved in the near future.

I am respectfully requesting that the deadline to file a post conviction application be extended to June 15, 2020 . AUSA Nichols consents to the request.

One of the difficulties is being able to communicate with Mr. Pilgrim in light of his incarceration at Franklin Correctional Facility. Hence, the need for additional time in order to fully explain to him his options.

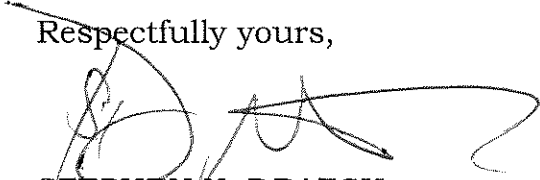
If our discussions do not achieve a resolution then it is the firm's intention

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to file a post-conviction application before the deadline. Moreover, we will consent to give the U.S. Attorney's Office thirty days (30) to reply to the petition, subject to the approval of the Court.

I am respectfully requesting the Court "SO ORDERED" this request

Respectfully yours,



STEPHEN N. DRATCH

SND/ni
cc: Allison Nichols
James Pilgrim